

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

---

BARCO, INC. and BARCO NV, )  
Plaintiffs, ) Case No. 2:23-CV-00521-JRG-RSP  
v. ) JURY TRIAL DEMANDED  
YEALINK (USA) NETWORK ) [REDACTED]  
TECHNOLOGY CO., LTD., and )  
YEALINK NETWORK )  
TECHNOLOGY CO., LTD. )  
Defendants. )  
\_\_\_\_\_  
)

**DECLARATION OF ERIK J. HALVERSON IN SUPPORT OF OPPOSITION TO  
DEFENDANTS' DAUBERT MOTION TO STRIKE OPINIONS OF DR. BROGIOLI**

I, Erik J. Halverson, hereby declare as follows:

1. I am a partner at the law firm of K&L Gates LLP and counsel for Plaintiffs Barco, Inc. and Barco NV (collectively, "Plaintiffs"). I have personal knowledge of the facts set forth in this Declaration and if called upon as a witness, I could and would testify to such facts under oath.
2. Attached as **Exhibit A** are true and correct excerpts from the June 10, 2025 deposition of Michael C. Brogioli, Ph.D.
3. Attached as **Exhibit B** are true and correct excerpts from the April 13, 2025 deposition of Dunxióng Cai.
4. Attached as **Exhibit C** is a true and correct copy of Yealink's firmware update status webpage, produced by Plaintiffs in this case with bates number BARCO\_0067469.
5. Attached as **Exhibit D** are true and correct excerpts from the April 25, 2025 deposition of Erwin Six.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 1, 2025 in San Francisco, CA.

*/s/ Erik J. Halverson*  
Erik J. Halverson

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document and accompanying Exhibits were filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on July 1, 2025.

*/s/ Erik J. Halverson*

**CERTIFICATE OF AUTHORIZATION TO SEAL**

I hereby certify that pursuant to Local Rule CV-5(a)(7), the foregoing document and accompanying Exhibits were filed under seal pursuant to the Court's Protective Order entered in this matter (Dkt. 30).

*/s/ Erik J. Halverson*